

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	Adv. Pro. No. 08-01789 (CGM)  SIPA Liquidation (Substantively Consolidated)
In re:  BERNARD L. MADOFF,  Debtor.	Adv. Pro. No. 12-01194 (CGM)

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,  
  
Plaintiff,  
v.  
  
KOOKMIN BANK,  
  
Defendant.

**STIPULATION AND ORDER**

Plaintiff Irving H. Picard (the “Trustee”), trustee for the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III (“SIPA”), and the chapter 7 estate of Bernard L. Madoff, and defendant Kookmin Bank (“Defendant,” and with the Trustee, the “Parties”), by and through their respective and undersigned counsel, state as follows:

**IT IS HEREBY STIPULATED AND AGREED**, that, the deadline for the Defendant to respond to the complaint in the Action (ECF No. 1) shall be March 7, 2022. If Defendant files a motion to dismiss the complaint, such motion shall set forth any and all grounds for dismissal

required to be asserted at the pleading stage. The deadline for the Trustee to respond to the motion shall be May 6, 2022, and the deadline for the Defendant to file a reply shall be June 6, 2022.

**IT IS HEREBY STIPULATED AND AGREED**, that if Defendant files a motion to dismiss the complaint, then the parties shall request oral argument on the motion at the Court's first available convenience.

Dated: January 26, 2022  
New York, New York

By: /s/ David J. Sheehan  
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*Attorneys for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*

By: /s/ Richard A. Cirillo  
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*Attorneys for Defendant Kookmin Bank*

**Dated: January 27, 2022**  
**Poughkeepsie, New York**



**/s/ Cecelia G. Morris**

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**Hon. Cecelia G. Morris**  
**Chief U.S. Bankruptcy Judge**